

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

FAHAD GHAFAR,)	
)	
Plaintiff,)	Civil Action No. 23-01455 (CRV)
)	
v.)	
)	
JOHN PAULSON, PAULSON PRV HOLDINGS, LLC, AND J.P. MORGAN TRUST COMPANY OF DELAWARE AS TRUSTEE OF THE PAULSON 2009 FAMILY TRUST,)	
)	
Defendants.)	

**JOINT MOTION SUBMITTING
PARTIES AGREED BRIEFING SCHEDULE**

COME NOW, Plaintiff, Fahad Ghaffar and Defendants John Paulson and Paulson PRV Holdings, LLC., and respectfully submit for the Court’s approval the following briefing schedule. In support of this request the parties state and pray:

1. John Paulson and Paulson PRV Holdings, LLC (the “Paulson Defendants”), filed a motion to dismiss the Amended Complaint in this action (ECF Doc. No. 28)(the “Motion to Dismiss”) on October 12, 2023.
2. The Plaintiff’s opposition to the motion to dismiss is currently due on October 26, 2023.
3. The undersigned counsel have conferred and wish to enter into an agreed upon schedule for briefing the Motion to Dismiss.
4. There has been no previous request for any extension or adjournment in connection with the Motion to Dismiss.

5. Pursuant to Rule 6 of the Local Rules for the United States District Court for the District of Puerto Rico the Clerk is “authorized to enter a first extension of time, provided it encompasses a period not to exceed thirty (30) days”

WHEREFORE the parties have stipulated as follows:

- a. The Plaintiff’s time to oppose the motion to dismiss shall be extended from October 26, 2023, to November 9, 2023;
- b. The Paulson Defendant’s time to file a reply shall be December 11, 2023.

Respectfully Submitted

I HEREBY CERTIFY that on this same date a copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to the attorneys of record.

In San Juan Puerto Rico on October 25, 2023

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